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and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SAN FERNANDO VALLEY DIVISION**

In re:

IRONCLAD PERFORMANCE WEAR
CORPORATION, a California corporation,

Debtor and Debtor in Possession.

In re:

IRONCLAD PERFORMANCE WEAR
CORPORATION, a Nevada corporation,

Debtor and Debtor in Possession.

- ☒ Affects both Debtors
- ☐ Affects Ironclad Performance Wear Corporation, a California corporation only
- ☐ Affects Ironclad Performance Wear Corporation, a Nevada corporation only

Lead Case No.: 1:17-bk-12408-MB
Jointly administered with:
1:17-bk-12409-MB
Chapter 11 Cases

**DEBTORS' SUPPLEMENT TO MOTIONS
FOR ASSUMPTION AND ASSIGNMENT OF
EXECUTORY CONTRACTS IN
CONNECTION WITH SALE OF DEBTORS'
ASSETS, REGARDING UPDATED CURE
AMOUNTS**

DATE: October 30, 2017
TIME: 10:00 a.m.
PLACE: Courtroom "303"
21041 Burbank Blvd.
Woodland Hills, CA

On October 9, 2017, Ironclad Performance Wear Corporation, a California corporation, and Ironclad Performance Wear Corporation, a Nevada corporation (collectively, the "Debtors"), the debtors and debtors-in-possession in the above-captioned Chapter 11 bankruptcy cases, filed a motion (the "Sale Motion") seeking an order of the Court approving the Debtors' sale of

substantially all of their assets. The Sale Motion includes a schedule of executory contracts and unexpired leases (the “Original Contracts and Leases”) along with proposed cure amounts in connection with the Original Contracts and Leases.

On October 20, 2017, the Debtors filed a motion to supplement the Sale Motion (the “Additional Contracts Motion”), which included additional contracts to be potentially assumed (the “Additional Contracts”) along with proposed cure amounts for the Additional Contracts.

This Supplement is intended to amend certain of the outstanding cure amounts owing by the Debtors to certain of the other parties to the Original Contracts and Leases, and the Additional Contracts.¹ The following parties’ proposed cure amounts are modified, as follows (all other proposed cure amounts as set forth in the Sale Motion and the Additional Contracts Motion remain the same):

Contracting Party Name	Description of Contract	Updated Cure Amount	Case
Advantage Media Services	Logistics and Warehousing Agreement	\$178,522.75	CA
AML United Limited	Vendor Contract	\$28,330.56	CA
Russ McDonald	Independent Contractor Agreement	\$98.65	CA
Shur Sales	Customer Contract	\$16,125.00	CA
TAB Sale Solutions	Sales Representative Agreement	\$430.52	CA

Dated: October 27, 2017

IRONCLAD PERFORMANCE WEAR
CORPORATION, *et al.*

By: /s/ Krikor J. Meshefejian
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MONICA Y. KIM
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Attorneys for Debtors and
Debtors in Possession

¹ None of the parties to the Original Contracts and Leases, or the Additional Contracts, have filed a response to the Sale Motion or the Additional Contracts Motion, or the cure amounts set forth therein. The amended cure amounts above are amounts that are greater than the amounts originally proposed.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 10250 Constellation Boulevard, Suite 1700, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled **DEBTORS' SUPPLEMENT TO MOTIONS FOR ASSUMPTION AND ASSIGNMENT OF EXECUTORY CONTRACTS IN CONNECTION WITH SALE OF DEBTORS' ASSETS, REGARDING UPDATED CURE AMOUNTS** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **October 27, 2017**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Shiva D Beck sbeck@gardere.com, jcharrison@gardere.com
- Ron Bender rb@lnbyb.com
- Cathrine M Castaldi ccastaldi@brownrudnick.com
- Russell Clementson russell.clementson@usdoj.gov
- Aaron S Craig acraig@kslaw.com, lperry@kslaw.com
- Matthew A Gold courts@argopartners.net
- Monica Y Kim myk@lnbrb.com, myk@ecf.inforuptcy.com
- Krikor J Meshefejian kjm@lnbrb.com
- Tania M Moyron tania.moyron@dentons.com, chris.omeara@dentons.com
- S Margaux Ross margaux.ross@usdoj.gov
- United States Trustee (SV) ustpregion16.wh.ecf@usdoj.gov
- Sharon Z. Weiss sharon.weiss@bryancave.com, raul.morales@bryancave.com

2. SERVED BY UNITED STATES MAIL: On **October 27, 2017**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **October 27, 2017**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Served via Attorney Service

Hon. Martin R. Barash
United States Bankruptcy Court
21041 Burbank Boulevard, Suite 342
Woodland Hills, CA 91367

☒ Service List Served by Overnight Mail Attached

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

October 27, 2017	Stephanie Reichert	/s/ Stephanie Reichert
Date	Type Name	Signature

III. SERVED BY OVERNIGHT MAIL:

Advantage Media Services, Inc.
Attn: Steven Helmle
29010 Commerce Center Drive
Valencia, CA 91355

AML United Limited
29th floor, Nanyang Plaza
57 Hung To Road, Kwun Tong
Kowloon, Hong Kong, China

Russ McDonald
23785 - 110B Avenue
Maple Ridge, B.C. V2W1 E6, Canada

Shur-Sales & Marketing, Inc.
3830 S Windermere St.
Englewood, CO 80110

TAB Sales Solutions
12109-94A Street
Grand Prairie, AB T8V 5C2 Canada